For the reasons presented below, it is respectfully submitted that the Ballard and Anand patents do not suggest the claimed subject matter to a person of ordinary skill in the art.

As discussed in greater detail in Applicant's previous response, the claims are directed to a template-driven approach to the configuration of network devices. In this type of approach, the same set of basic commands is applied to each device. However, within each set of commands, variable data, such as the addresses of source and destination computers, is selected from a database. This approach eliminates the need to manually enter each address multiple times, and thereby significantly reduces the likelihood of errors.

In rejecting claim 1, the Office Action asserts that the Ballard patent discloses a database that stores the network address of specific devices, and an interface responsive to a command for retrieving the stored record associated with a given device, "substituting the network address in the retrieved record for the variables in said template," and issuing commands to manage the given device in accordance with said retrieved record "and said template." It is respectfully submitted that the disclosure of the Ballard patent does not support this assertion. Specifically, the Ballard patent does not disclose the concept of substituting address information retrieved from a database for variables in a template. Rather, the Ballard patent discloses a network diagnostic system having a link connection subsystem manager (LCSM) 3 that receives generic problem determination and control requests from a user. Upon receiving such a request, the LCSM accesses a database 4, to obtain device-specific data. Based upon this data, the LCSM 3 generates device-specific diagnostic and control commands that are sent to the systems being analyzed.

(Column 4, lines 64-67) The Ballard patent does not disclose the concept of substituting the information obtained from the database for a variable in a template, and issuing commands to configure a device in accordance with the retrieved record and template.

To this end, the Office Action explicitly acknowledges that the Ballard patent does not disclose a template that contains commands, nor does it relate to the configuration of devices. For this purpose, therefore, reliance is made upon the Anand patent. Again, however, it is respectfully submitted that the reference does not teach the claimed concepts.

The Office Action states that the Anand patent discloses a template that contains a sequence of commands, with reference to the "library of commands" discussed at column 8, lines 28-39. The rejection is based upon the assumption that the "library" disclosed in the Anand patent corresponds to a template recited in the claim. It is respectfully submitted, however, that the two terms do not connote the same thing. In the field of computer science, a library is a collection of sub-programs, or commands. In contrast, claim 1 recites that a template "contains a sequence of commands ..., wherein each command that refers to a particular device contains a variable as the identification of the device." There is no suggestion in the Anand patent that its libraries constitute, or otherwise contain, templates as defined in the claim. For instance, there is no disclosure that any command stored in the library that refers to a particular device contains a variable as the identification of the device. Rather, the Anand patent discloses that its libraries function to map generic commands to specific-platform commands. See column 8, lines 34-39.

VA 807795.1

Hence, even if one were to apply the teachings of the Anand patent to the diagnostic system of the Ballard patent, the result would not be the same as the presently claimed subject matter. Rather, the logical combination of these two patents would be to employ Anand's libraries within the LCSM of Ballard's diagnostic system, to map generic commands received from the user into device-specific requests that are sent to the target systems. Neither of the patents teach, nor otherwise suggests, a template-based approach in which commands that refer to particular devices contain variables as the identification of the devices, as well an interface that is responsive to receipt of a command to substitute network addresses retrieved from the database for the variables in a template, and issue commands in accordance therewith.

For at least these reasons, therefore, it is respectfully submitted that the Ballard and Anand patents do not suggest the subject matter of claim 1, even when their teachings are considered in conjunction with one another. For the same reasons, the subject matter of claim 8 is likewise not suggested.

In addition to the foregoing differences, other distinguishing features of the invention are recited in the dependent claims. In view of the differences identified above, it is believed that a detailed discussion of these other distinctions is not necessary at this time.
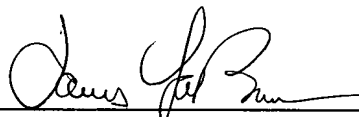
The Office Action repeats the provisional rejection of claims 1-14 on the basis of obviousness-type double patenting, in view of the claims of copending Application No. 09/843,815. As noted in Applicant's previous response, since the rejection is only provisional in nature, no action is required until such time as the copending application issues as a patent.

Reconsideration and withdrawal of the rejections, and allowance of all pending claims are respectfully requested.

Respectfully submitted,

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